

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, WESTERN DIVISION**

Keith Robins and Christine Robins

Plaintiff,

vs

PNC Bank, N.A. and National City Mortgage Company

Defendants.

PNC Bank, N.A., successor to National City Bank

Counter-Plaintiff,

vs

Keith Robins; Christine Robins; and Rockford Bell Credit
Union

Counter-Defendants,

No. 12 CV 3086

MOTION FOR JUDGMENT OF FORECLOSURE AND SALE

NOW COMES the Counter-Plaintiff, PNC Bank, National Association, successor to National City Bank, by its attorneys CROWLEY & LAMB, P.C., and moves the Court for the entry of a Judgment of Foreclosure and Sale in its favor and against the Counter-Defendant(s):

Keith Robins, Christine Robins, and Rockford Bell Credit Union, and as grounds thereof state:

As appears from the Affidavit of Counter-Plaintiff placed on file in support of this Motion, and from the pleadings and admissions on file, there is no genuine issue as to any material fact, and the Counter-Plaintiff is entitled to a Judgment of Foreclosure and Sale in this case as a matter of law.

PNC Bank, National Association, successor to National
City Bank

By: /s/ Christina M. Ripley
One of Its Attorneys

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